

## **Exhibit 198**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

No. 1:19-md-2875-RBK  
Hon. Robert Kugler

**Plaintiffs' Motion for Class Certification of  
Economic Loss Consumer Claims**

**DECLARATION OF RUBEN HONIK**

I, RUBEN HONIK, declare:

1. I have personal knowledge of the matters set forth herein, and if called to testify thereto, I could and would do so competently.

2. Should this proceeding be certified as a class action under Fed. R. Civ. P. 23, I am qualified to serve as class counsel on behalf of my firm, Honik LLC. I am a preeminent trial attorney with a national practice and reputation with over forty (40) years of experience. A Past President of the Pennsylvania Trial Lawyers Association (2007-2008) and the Philadelphia Trial Lawyers association, I have served and/or been court appointed to leadership positions (lead, co-lead, executive or steering committees) in numerous MDLs, coordinated actions, class actions, and individual actions, including: *In re Metformin Marketing and Sales Practices Litigation*, No. 2:20-cv-02324 (D.N.J.); *In re Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation*, No. 13-md-2428 (D. Mass.); *Cullen et al. v. Whitman Medical Corporation d/b/a Whitman Education Group, Inc., et al.*, 197 F.R.D. 136 (E.D. Pa.); *In re Budeprion XL Marketing & Sales Litigation*, MDL No. 2107 (E.D. Pa.); *In re Checking Account Overdraft Litigation*, MDL No.

2036 (2009); *Mattel Lead Paint Class Action*, MDL No. 1897 (E.D. Pa.); *David v. American Suzuki Motor Corp.*, No. 08-CV-22278 (S.D. Fla.); and *In re Intuniv Antitrust Litigation*, No. 16-cv-12653 (D. Mass.). I have also been recognized as a Super Lawyer every year since that designation was first created and am AV Preeminent as recognized by Martindale- Hubbell.

3. I have already been appointed by this Court to serve on the Plaintiffs' Executive Committee ("PEC") and as co-lead counsel for Plaintiffs (Dkt. No. 96 (CMO No. 6)). I have committed extensive time and resources to the prosecution of this MDL. Among other things, my work has included co-coordination of the overall litigation and strategy of this MDL for the Plaintiffs' side, including overseeing pleadings, briefing, arguments, discovery, and expert work.

4. I have continuously been an attorney in good standing licensed to practice law in the States of Pennsylvania (1980) and New Jersey (1980) and have never been the subject of a complaint or grievance in any state bar proceeding.

5. I have been and will continue to be willing, able, and dedicated to committing my firm's resources, including labor and expenses, to vigorously litigating this matter on behalf of the Plaintiffs named herein and the putative class members until this case reaches a final determination.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed in Philadelphia, Pennsylvania this 10th day of November, 2021.



---

Ruben Honik